

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	Trial: April 26, 2021
<i>Defendant.</i>)	
_____)	

**UNITED STATES' NOTICE OF REQUEST FOR HEARING ON
MOTION FOR ORDER TO SHOW CAUSE AND TO SEAL**

The United States of America, by and through undersigned counsel and pursuant to Local Criminal Rule 47, hereby files this notice requesting that the Court schedule a hearing on the United States' pending motion for an order to show cause and to seal [Dkt. Nos. 170 & 173], if the Court deems one necessary. In support thereof, the government states as follows:

1. On December 18, 2020, the United States filed a motion for an order to show cause and to seal regarding the defendant's violations of the Protective Order. Dkt. No. 170. On December 21, 2020, the Court granted the motion in part, ordering that certain documents be sealed, and advised that it will await full briefing before ruling on other portions of the government's motion. Dkt. No. 172.

2. On December 30, 2020, the defendant filed his response to the government's motion, [Dkt. No. 181], and on January 6, 2021, the government filed its reply, [Dkt. No. 190].

3. The motion is therefore fully briefed and the government does not believe there are any outstanding factual issues to resolve. The issues raised in the government's motion involve extremely sensitive law enforcement information with the potential to jeopardize other investigations, and the harm caused by the defendant's violation of the Protective Order is ongoing.

See Dkt. Nos. 173 & 190. Accordingly, the government respectfully submits that this matter can be resolved appropriately, and indeed more expeditiously, without a hearing.

4. The government nevertheless files this notice out of an abundance of caution and in the event that the Court believes oral argument would aid the Court's decisional process. The pre-trial conference in this matter has been continued from January 15, 2021, to April 9, 2021, and there are currently no other hearings scheduled before then at which the parties could address the government's pending motion with the Court. Sensitive information subject to the Protective Order in this case remains publicly available, however, and the defendant's violations therefore continue to jeopardize ongoing and future investigations into the sexual exploitation and abuse of children. Given the importance of protecting these ongoing and future investigations, the government respectfully requests that the Court schedule a hearing at its earliest availability if it believes oral argument is necessary here.

Respectfully submitted,

G. Zachary Terwilliger
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/s/

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/
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